

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

06 CV 13439 (RPP)
07 CV 00959, 01357, 02562, 03104, 03180

INDEMNITY INSURANCE CO. OF
NORTH AMERICA,

Plaintiff,
- against -
C.U. TRANSPORT, INC., et al.,

Defendants.

And Five Related Cases

NOTICE TO PRODUCE PROPOUNDED BY
DEFENDANTS, YANG MING MARINE
TRANSPORT CORP. AND YANG MING
(AMERICA) CORP. TO ALL OPPOSING
COUNSEL IN CONJUNCTION WITH
DISMISSAL MOTION

PLEASE TAKE NOTICE that in conjunction with the undersigned's motion to dismiss, you are requested to produce along with your answering papers true and complete copies of both sides – with legible terms and conditions - of all bills of lading, waybills or other contracts of carriage or affreightment which:

- (a) You will rely upon in opposing the prefixed motion to dismiss; and/or
- (b) Which covered any of the cargoes which are the subject of these actions (except for the bills of lading issued by YANG MING MARINE TRANSPORT CORP.)

Dated: New York, NY, July 31, 2007

CICHANOWICZ CALLAN KEANE VENGROW & TEXTOR, LLP
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Attorneys for Defendants, YANG MING MARINE TRANSPORT CORP. and
YANG MING (AMERICA) CORP.

By: /s/ Paul M. Keane
PAUL M. KEANE [PK-5934]